

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

WEST PUBLISHING CORPORATION,	X :	
Plaintiff / Counterclaim- Defendant,	:	
v.	:	
LEGALEASE SOLUTIONS, LLC,	:	Civ. No. 18-CV-01445 (DSD/ECW)
Defendant /Counterclaim- Plaintiff.	:	
	X	

**MEET AND CONFER  
STATEMENT FOR PLAINTIFF AND  
COUNTERCLAIM-DEFENDANT WEST  
PUBLISHING CORPORATION’S MOTION TO  
MODIFY AMENDED PRETRIAL SCHEDULING ORDER**

I, Scott T. Lashway, representing Plaintiff and Counterclaim-Defendant West Publishing Corporation, hereby certify that I attempted to meet and confer with LegalEase Solutions, LLC (“LegalEase”) prior to filing this motion.

On Wednesday, December 11, 2019, immediately following our hearing on Exhibit K to West’s Motion to Compel, I called local counsel for LegalEase, Amanda Cefalu, and left a voicemail indicating that we likely intended to seek an extension of the fact discovery deadline and inquiring into whether LegalEase would consent to such an extension. On Monday, December 16, having not received a response to my voicemail, I sent an email to Ms. Cefalu with copy to LegalEase counsel Kassem Dakhallallah asking if she was available to discuss an extension of fact discovery. I explained that ROSS

informed us on Sunday, December 15, that it would be producing an additional 5,500 documents and therefore we believed an extension was appropriate. We did not receive a response to that email from Ms. Cefalu or Mr. Dakhallallah.

On Tuesday, December 17, I once again called Ms. Cefalu and left a voicemail reiterating our request. I immediately followed up with an email to Ms. Cefalu and Mr. Dakhallallah asking for an immediate response as to whether they would consent to our requested extension. We did not receive a response to the email or voicemail from December 17 from either Ms. Cefalu or Mr. Dakhallallah.

On December 19, my colleague Mara O'Malley left a voicemail for Mr. Dakhallallah asking that he respond to our request. I also emailed Mr. Dakhallallah and Ms. Cefalu on the afternoon of December 19 reiterating the same. Mr. Dakhallallah responded and ask that we send a draft stipulation for his review, which we did the next day, Friday, December 20. I also spoke with Ms. Cefalu by phone on December 20, asking that we obtain counsel's consent to file the stipulation as soon as possible. We did not receive any response to our draft stipulation on Friday or over the weekend.

This morning, Monday, December 23, Ms. O'Malley sent a revised draft to Ms. Cefalu and Mr. Dakhallallah by email, asking again for assent to file the stipulation. As explained in that email, the revisions to the draft stipulation reflected only certain updates regarding ROSS's document productions. Ms. O'Malley also left voicemails for Mr. Dakhallallah on both his office and mobile phones and sent a final email requesting assent this evening.

As of the time of filing, we have received no response from Mr. Dakhallallah regarding the draft stipulation. In an effort to resolve this matter sufficiently in advance of the current deadline to allow the parties to adjust to the amended schedule we are proceeding with filing a motion to amend the amended pretrial scheduling order, rather than proceed by stipulation as we would prefer.

Dated: December 23, 2019

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/s/ Scott T. Lashway  
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***Attorneys for West Publishing  
Corporation***

**CERTIFICATE OF SERVICE**

I, Mara A. O'Malley, hereby certify that on December 23, 2019, this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Mara A. O'Malley  
Mara A. O'Malley